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November 12, 2014

VIA ECF

The Hon. Rya W. Zobel
United States District Court Judge
District of Massachusetts
John Joseph Moakley Federal Courthouse
1 Courthouse Way
Boston, MA 02210

**Re: *New England Compounding Pharmacy, Inc., Production Liability Litigation,*
MDL NO. 2419. This document applies to New Jersey Actions only**

Dear Judge Zobel:

This office represents several New Jersey Plaintiff's in MDL No. 2419 who are asserting claims against the Premier Clinic Defendants. The Premier Defendants on November 10, 2014 have filed a motion for leave to file representative master answers. [Dkt No. 1535] We write presently to note an objection to this requested relief based upon the asymmetric nature of the relief requested by the Premier Defendants.

The motion requests permission to file master representative answers in lieu of responding to each complaint against them without offering similar relief to Plaintiffs as to New Jersey's Affidavit of Merit requirements that the filing of the answers will trigger. We believe representative affidavits of merit should be likewise provided for in the requested order. Such will eliminate needless efforts and unnecessary costs associated with obtaining and producing the affidavits of merit relating to the same alleged conduct and omissions in each case.

We believe the parties may be able work out a resolution of this objection and are conferring with Premier's counsel on this. We therefore respectfully request the Court not to rule on the motion until the next Status Conference in December.

We thank the Court for its attention.

Respectfully submitted,



MICHAEL COREN

MC/lnw
cc: All Counsel (via ECF)

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